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CITY OF VALLEJO, VALLEJO POLICE  
DEPARTMENT, OFFICER ROBERT  
DEMARCO, AND ANDREW BIDOU

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

LUIS TRUJILLO-LOPEZ,

Plaintiff,

v.

CITY OF VALLEJO, VALLEJO POLICE  
DEPARTMENT, POLICE OFFICER  
ROBERT DEMARCO, CHIEF OF POLICE  
ANDREW BIDOU, and DOES 1-100,

Defendants.

**CASE NO.: 4:20-cv-02139-JSW**

Assigned to the Hon. Jeffrey S. White

**DEFENDANT'S REPLY TO ORDER TO  
SHOW CAUSE AND WITHDRAWAL OF  
OBJECTION TO VENUE**

Ctrm: 5  
Filing Date: March 27, 2020

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 The City of Vallejo (“City”) filed a Motion To Dismiss, or, in the Alternative to Strike  
 3 Portions of Complaint (Doc. No. 22) asserting, inter alia, that venue in the Northern District of  
 4 California is improper under 28 U.S.C. § 1391, as the City of Vallejo is a public entity located and  
 5 wholly operating in Solano County, California, and every alleged event or omission giving rise to the  
 6 claims in the Complaint occurred in Solano County. Plaintiffs Opposition was filed on August 1,  
 7 2022 (Doc. No. 26) and Defendant’s Reply was filed on August 8, 2022 (Doc. No. 31). On  
 8 October 13, 2022, the Court issued an Order to Show Cause to the City to “show cause in writing  
 9 regarding the domicile, at the time the suit was initiated, of each named Defendant for purposes of  
 10 determining if venue is proper pursuant to 28 U.S.C. section 1391.” (Doc. No. 34.)

11 The City subsequently determined that when the suit was filed on March 27, 2020, Defendant  
 12 Officer Robert DeMarco resided in Sonoma County, making venue in the Northern District of  
 13 California Proper. 28 U.S.C. § 1391(b), (c)(2). Defendants therefore withdraw their objections to  
 14 venue in the Northern District of California, and request that a hearing be set on the other grounds  
 15 raised in the City’s Motion.

16  
 17 DATED: October 17, 2022

**COLANTUONO, HIGHSMITH &  
 WHATLEY, PC**

*/s/ Pamela K. Graham*

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 DEMARCO AND FORMER CHIEF OF  
 POLICE ANDREW BIDOU